

PERMIT EFFICIENCY IMPLEMENTATION PLAN
AIR

** Indicates Priority

Opp#	Opportunity	Strategy #	Strategy	Target Date	Implementation Status	Long Term Goal	Short Term Goal	Notes (resource needs, barrier, etc.)	Benefits of Implementation	Issues to be addressed	Lead	Team
** 1	Improve application process	1	Constitute a focus group/working team to review/discuss improvements to forms and guidelines.	12/31/2005	Complete	Program Capability	Timely and Accurate Permits	Title V application forms must be approved by EPA. Funding for web application needed; Air permitting is all case-by-case so there is no definitive right answer that would cover a large portion of the regulated community	More complete and accurate permit applications; Increased productivity per labor hour; Decreased rework; Decreased manual data entry.	Smaller facilities are the ones who usually need more guidance due to lack of environmental resources/consultants.	Tamera Thompson	Sharon Foley Jaime Bauer Troy Breathwaite Chris Meoli Jennifer Hoeffner Lillian Alexander Allen Armistead
		3	Streamline Form 805 (Title V) and Form 7 (Minor NSR) to eliminate non-value added information.	9/30/2006	Planning							
		5	Web-ify application process/online application, including ensuring design and use makes the process easier (TURBO TAX APPROACH).	TBD	Planning							
		4	Improve applicability determination guidance for large, complex facilities (including more/better decision trees).	6/30/2007	Planning							
		2	Consolidate currently available guidance for ease of access by permittees and permit writers. Look into what USEPA and other states are using	9/30/2006	In process							
		1	(a) Inventory number of industrial facilities eligible for general permits [done]. (e) Take a further look at opportunities; quantify number of IP to become GP.	6/30/2006	In process							
			(b) Revisit to determine if general permits even needed - risk basis (quantify compliance issues by source category)	6/30/2006 (More information needed)	Planning							
			(c) Revisit permit strategy for some of these types of facilities to address multi media aspects/multi-media regulatory requirements.	12/31/2006	In process							
		2	Identify barriers to implementation due to USEPA/legacy permits, including resolution of differences.	12/31/2006	In process							

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2	Streamline/ expand use of general permits	3	Identify lessons learned from non-metallic general permits and improvement opportunities, including degrees of documentation/approval activity.	12/31/2006	In process	Program Capability	Timely and Accurate Permits	Need industry and citizen parties interested in development of GPs; GP must go through APA process as required by law; Multi-media permits may be difficult to consolidate into one because of varying requirements; Staff would need to be experienced in all media for multi-media permit enforcement. ****General Assembly has previously turned down DEQ request to exempt general permit from APA.	Reduce permit issuance and maintenance time by 66% as compared to individual permits.	General Permit Programs used for synthetic minor status must ensure that a facility is not going to trigger major source requirements (i.e. - must limit PTE of facility)	Bob Mann	Bill Cash Robertson Jed Brown Jaime Bauer Andy Gayne
		4	Look at general permit implementation in other states (e.g. NC).	6/30/2006	In process							
		5	Develop strategy to get more public participation on ad-hoc general permit committees, including benefit of geographic location of ad-hoc meetings.	6/30/2006	In process							
		8	Capture multi-media and permitting approach (e.g., for combustors/incinerators).	12/31/08 (Multimedia Assistance/Inp ut Needed)	In process							
		6	Identify process to develop appropriate monitoring and reporting frequencies for specific types of general permits.	12/31/2006	In process							
		7	Explore options for exempting general permits from Administrative Process Act (APA) and/or permit-by-rule.	TDB	Planning							
		9	Determine amenability of GP sources to multi-media inspection approaches.	12/31/08 (Multimedia Assistance/Inp ut Needed)	Planning							

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3	Reduce the complexity of source compliance requirements (Superceding NSR permits with TV permits)	1	Investigate what other states are doing.	12/31/2006	In process	Community	Effective Incentives	Regulation or law change may be necessary	Reconcile different and conflicting requirements; Eliminate cross-referencing efforts; improve permittee compliance.	Underlying NSR permits are backbone of Title V program. Without NSR - Title V conditions have no reference of applicable requirements; Having only Title V permit which must go to EPA for review leaves facilities vulnerable to EPA objection of BACT during amendments for construction/modifications.	Tamera Thompson	Bob Mann
		2	Define legality issues of eliminating underlying requirements per NSR.	12/31/2006	In process							
		3	Identify facility-specific opportunities to supersede NSR.	12/31/2006	In process							
		4	Document situations where conflicting or different conditions in multiple permits adversely impacts a permittee's ability to comply. Note: There are significant barriers to consolidation, including: (a) State BACT/underlying nature of VADEQ permits (b) USEPA Region III interpretations (c) State level of interest in superseding NSR permit via case decision and potential creation of legal loopholes (d) Complexity of working through all the issues	12/31/2006	In process							
** 4 (Combine with Oppor t. 5 and 8)	Streamline how minor NSR changes are incorporated into Title V permits	1	Identify source of requirement (Federal vs. State regs and statutes) for each applicable program.	12/31/2006	In process	Program Capability & Financial Resources	Timely and Accurate Permits & Certain, consistent, timely compliance and enforcement & Maximixe efficient use of current resources	Language of regulation not clear leaving it open for interuptation. Regulation or law change may be necessary	Save time and effort, in processing unnecessary Title V permit amendments; Ability to make changes more quickly/flexibility is a business competitive advantage; Environmentally neutral or beneficial.	Facilities risk chance of constructing or modifying then receiving public controversy after the fact.	Tamera Thompson	Sharon Foley Jaime Bauer Jerome Brooks Troy Breathwaite
		2	Identify barriers to make a change.	12/31/2006	In process							
		3	Improve current guidance to permit staff clarifying the timing and necessity of Title V permit revisions.	12/31/2006	In process							
		4	Explore the development of enforcement discretion policy.	12/31/2006	In process							
		5	Explore concurrent NSR and Title V permit processing procedures.	12/31/2006	In process							
		6	Utilize pre-application meetings to clarify NSR/Title V potential conflicts.	12/31/2006	In process							
		7	Evaluate use of NSR permit language that reduces conflicts with Title V permits	12/31/2006	In process							

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		8	Evaluate use of self-effecting minor permit amendments for defined scenarios.	12/31/2006	In process							
		9	Benchmark North Carolina's approach to Title V/NSR.	12/31/2006	In process							
** 5 (Combine with Oppor t. 4 and 8)	Streamline permit amendment and renewal process	1	Revisit criteria and interpretation of what triggers a minor vs. significant amendment vs. administrative change (especially in reference to changes resulting in improvements, e.g. decrease emissions). As part of this action, better define what constitutes "case-by-case" and define specific scenarios to improve consistency of interpretation and understanding (VADEQ staff and regulated community).	12/31/2006	In process	Program Capability & Community	Timely and Accurate Permits & Effective Incentives		Ability to make changes more quickly/flexibility is a business/competitive advantage; Reduced amount of time permittee needs to spend on preparing renewal documentation.		-Tamera Thompson	Bob Mann Troy Breathwaite
		2	Identify what other states in USEPA Region III are doing.	9/30/2006	In process							
		3	Identify what other USEPA regions are doing.	9/30/2006	In process							
		4	Evaluate how to maximize the use of cross-referencing unchanged information from previous submissions. Do this for a broader range of source types.	12/31/2006	In process							
		5	Utilize work force development plan to retain experienced permit writers. (Being handled by HR with Career Path)	TBD (EMT & HR working on plan)	In process							

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6	Hold public hearings when specifically requested by the public	1	Prepare list of the total number of mandatory public hearings and the percentage that are not attended by the public.	6/30/2006	Planning	Financial Resources	Maximize efficient use of current resources	Regulation are specific as to when public hearings are required - regardless of public interest	Limit VADEQ resources spent on mandatory public hearings where no public interest has been expressed.	EPA has pointed out lack of public participation in VA permit programs.	Mike Murphy	Jeff Steers Mann	Bob
		2	Evaluate need for alternatives for mandatory public hearings that provide equivalent public participation.	6/30/2006	Planning								
		3	Identify source of requirement (Federal vs. State regs and statutes) for mandatory public hearings (e.g., state Major NSR) for each applicable program.	6/30/2006	Planning								
		4	Identify barriers to make a change. Instruct public re: public comment as part of community outreach initiatives.	6/30/2006	In process								
				6/30/2006									
				6/30/2006									
		7	Electronically submit routine reports	1	Prepare an information matrix of report types, which VADEQ (or other agency) offices they go to, and how they are processed at each office. Use this as a baseline to understand similarities and variability's in report management and data entry activities and procedures.								
2	Identify technology changes needed, including verifying and documenting receipt.			12/31/2007	Planning								
3	Look at what is being done in other states [e.g. EI in NJ, Ohio] [SC accepts electronic spreadsheets].			6/30/2006	Planning								
4	Resolve barriers in statues and regulations [electronic signatures].			12/31/2006	Planning								
5	Utilize information learned from eDMR experience to expedite on-line air data entry.			6/30/2006	Planning								

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		6	Obtain cost justification information from e-Visory.	12/31/2006	Planning							
** 8 (Combine with Oppor- t. 4 and 5)	Clarify Title V semi-annual and annual reporting requirements to eliminate duplicative report preparation work by permittees.	1	Clarify VADEQ requirements for semi-annual deviation and annual compliance reports.	12/31/2006	In process	Community	Effective Incentives	Need involvement by regulated community. Need to inform regulated community of changes to the existing forms and the impact on their existing reporting mechanisms	Decrease report preparation time (permittees) by one week per Title V permittees (There are about 300+ Title V permits); Decrease report review time (VADEQ); Reduce discrepancies/rework between second and semi-annual reports	Staff is unsure what regulated community believes to be duplicate information. Train DEQ staff on changes to reporting requirements. Revise existing DEQ tools used to ensure compliance with existing reporting requirements	Jerome Brooks	Andy Gayne Bazyk Breathwaite Crystal Troy
		2	Prepare sample report formats for 1st semi-annual deviation report and combined 2nd semi-annual and annual report. Have Peer Review Team look at sample formats and provide feedback.	12/31/2006	In process							
		3	Check Part 70 regulations to confirm that deviation information in the semi-annual reports does not have to be relisted in the annual compliance certification.	12/31/2006	In process							
		4	If reporting dates in permit do not align with standard semi-annual and annual report submittal dates, investigate allowing permittees to align with those dates through a minor amendment/self effecting change.	12/31/2006	In process							

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Internal Meeting Opportunities - July 20, 2005												
1	Regulatory Development Improvements	1	Make current regulatory development process transparent to DEQ operations (Staff input before regulatory process is complete)	12/31/2006	Planning	Program Capability	Proactive policy, comprehensive planning, and effective program development	Staff participation on development groups cost time writing permits or inspecting facilities, but time saved in having a reg that can easily be implemented would make it worth time.	Smoother Implementation by permit, enforcement, and regional staff of new regulations.	More staff input/review before reg goes to public for comment to ensure proper implementation.	Tamera Thompson	Bob Mann Jaime Bauer
2	Application Streamlining (Form 7) (Same as opportunity 1)	1	Improved formatting/packaging of information to make instructions easier to understand and forms easier to complete.	6/30/2006	Planning	Program Capability	Timely and Accurate Permits	See Opportunity 1 from Action Plans involving Industry	See Opportunity 1 from Action Plans involving Industry	See Opportunity 1 from Action Plans involving Industry	Tamera Thompson	Sharon Foley Jaime Bauer Troy Breathwaite
		2	Clearly define required content and eliminate requests for unneeded information.	6/30/2006	Planning							
		3	Identify optional deployment mechanisms.	6/30/2006	Planning							
3	Reduce over reliance of regulated community on DEQ Staff to make applicability decisions and provide specialist expertise on BACT, risk assessment, etc.	1	Define and document "rules of engagement" for when and how to provide assistance in determining need for permit versus qualification for exemption and when to provide "comfort letters."	9/30/2006	Planning	Program Capability	Time and Accurate Permits	Ideas include: emphasis on pre-app meetings; periodic seminars to educate the regulated community; provide better, more complete info on web site or in fact sheets/pamphlets.	Decrease staff time doing consultant work; more time to work on issuing permits, etc.	Need to maintain a level of customer service	Tamera Thompson	Jed Brown Jaime Bauer
		2	Identify mechanisms to inform regulated community and enable accurate self-assessments of status and needs.	9/30/2006	In process							
		3	Define when and how to provide assistance in determining MACT applicability	9/30/2006	Planning							
		4	Define when and how to provide assistance in determining BACT.	9/30/2006	Planning							
		5	Define when and how to provide assistance in conducting risk assessments and evaluations of human health impacts from specific conditions (e.g. formaldehyde)	9/30/2006	Planning							